



C-194-99

COMMONWEALTH of VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY

James S. Gilmore, III
Governor

Northern Virginia Regional Office
13901 Crown Court
Woodbridge, VA 22193-1453
(703) 583-3800 fax (703) 583-3801
<http://www.deq.state.va.us>

Dennis H. Treacy
Director

John Paul Woodley, Jr.
Secretary of Natural Resources

Gregory L. Clayton
Regional Director

June 9, 1999

Ms. Rebecca Gearhart
Lab Corp.
13900 Park Center Road
Herndon, VA 22071

RE: Return to Compliance
Lab Corp. (Formerly National Health Lab.)
VAD982699274

Dear Ms. Gearhart:

Thank you for your May 27, 1999, letter and attachments received by the Department on June 1, 1999 and for the subsequent information received by the Department on June 8, 1999. The information provided appears to address satisfactorily the violations identified in the April 30, 1999, Notice of Violation. The violations have been resolved and Lab Corp. returned to compliance with the Virginia Hazardous Waste Management Regulations.

If I can be of any further assistance, please call me at (703) 583-3898.

Sincerely,

A handwritten signature in cursive script that reads "Stephanie M. Canfield".

Stephanie M. Canfield
Enforcement/Compliance Specialist

cc: Claire Ballard
Jon Terry

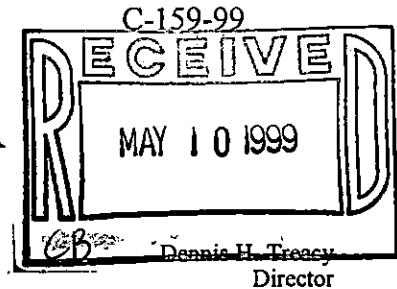


COMMONWEALTH of VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY

James S. Gilmore, III
Governor

John Paul Woodley, Jr.
Secretary of Natural Resources

Northern Virginia Regional Office
13901 Crown Court
Woodbridge, VA 22193-1453
(703) 583-3800 fax (703) 583-3801
<http://www.deq.state.va.us>



Gregory L. Clayton
Regional Director

NOTICE OF VIOLATION

April 30, 1999

Ms. Rebecca Gearhart
Lab Corp.
13900 Park Center Road
Herndon, VA 22071

RE: RCRA Inspection - Notice of Violation
Lab Corp. (Formerly National Health Lab.)
VAD982699274

Dear Ms. Gearhart:

This letter notifies you of information upon which the Director may rely to institute an administrative or judicial enforcement action. It is neither a case decision under the Virginia Administrative Process Act, Code § 9-6.14:1 *et seq.*, nor an adjudication.

FACTS AND LEGAL REQUIREMENTS

On April 16, 1999, the staff of the Department of Environmental Quality (DEQ), Northern Virginia Regional Office (NVRO) conducted an inspection at your facility. During the inspection, NVRO evaluated the facility for compliance with the Virginia Hazardous Waste Management Regulations (VHWMR) as a small quantity generator. I have enclosed a survey sheet and inspection checklist for your review. Based on the inspection, the Department has information indicating that the facility may be in violation of the VHWMR. This information is noted on the enclosed inspection checklist and summarized below.

1. At the time of the inspection, the facility could not provide documentation demonstrating that the facility had established agreements with the local authorities (Police and Fire Department) and the local hospital.

40 CFR 265.37- (a) The owner or operator must attempt to make the following arrangements, as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:

(1) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes;

(2) Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority;

(4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

(b) Where State or local authorities decline to enter into such arrangements, the owner or operator must document the refusal in the operating record.

[as referenced at 9 VAC 20-60-265; formerly 9 VAC 20-60-540.F (§9.2.F)]

2. At the time of the inspection, Lab Corp. was collecting ethyl acetate/acetic acid waste in a satellite accumulation area. Lab Corp. periodically takes the collected waste, neutralizes it and pours it down the drain leading to the Publically Owned Treatment Works (POTW). Lab Corp. has not developed or submitted a Waste Analysis Plan for this treatment activity.

40 CFR 268.7(a)- (4) If a generator is managing prohibited waste in tanks, containers, or containment buildings regulated under 40 CFR 262.34, and is treating such waste in such tanks, containers, or containment buildings to meet applicable treatment standards under subpart D of this part, the generator must develop and follow a written waste analysis plan which describes the procedures the generator will carry out to comply with the treatment standards. (Generators treating hazardous debris under the alternative treatment standards of Table 1, Sec. 268.45, however, are not subject to these waste analysis requirements.) The plan must be kept on site in the generator's records, and the following requirements must be met:

(i) The waste analysis plan must be based on a detailed chemical and physical analysis of a representative sample of the prohibited waste(s) being treated, and contain all information necessary to treat the waste(s) in accordance with the requirements of this Part, including the selected testing frequency.

(ii) Such plan must be filed with the EPA Regional Administrator (or his designated representative) or State authorized to implement Part 268 requirements a minimum of 30

Mr. Gearhart
RCRA Inspection
page 3

*days prior to the treatment activity, with delivery verified.
[as referenced at 9 VAC 20-60-268; formerly 9 VAC 20-60-1440.G.1.d. & d.(2)
(15.1.G.1.d & d.(2))]*

These issues were discussed with you during the inspection and are noted on the inspection checklist.

ENFORCEMENT AUTHORITY

Code § 10.1-1455 of the Waste Management Act provides for an injunction for any violation of the Act, any Waste Management Board regulation, any condition of a permit or certification, or order. The same statute provides for a civil penalty up to \$25,000 per day of such violation. Code § 10.1-1455 also authorizes the Board to issue orders to address such violations. In addition, Code § 10.1-1186 authorizes the Director of DEQ to issue special orders to any person to comply with the Act and regulations, and to impose a civil penalty of not more than \$10,000.

The Court has the inherent authority to enforce its injunction, and is authorized to award the Commonwealth its attorneys' fees and costs.

FUTURE ACTIONS

I must make a recommendation about how to proceed with this matter and whether to initiate an enforcement action based upon these facts. If you wish, a meeting to discuss the resolution of the issue can be arranged.

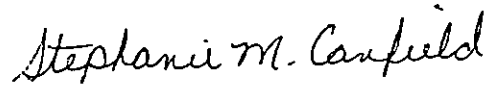
Please contact this office within ten calendar days of the date of this letter if you dispute any of the facts I have stated or if there is other information you believe DEQ should consider.

Please take appropriate action to address the issues noted above and provide documentation of your actions to DEQ within 30 calendar days of the date of this letter.

Mr. Gearhart
RCRA Inspection
page 4

If you have any questions, please call me at (703) 583-3898.

Sincerely,

A handwritten signature in black ink that reads "Stephanie M. Canfield". The script is cursive and fluid.

Stephanie M. Canfield
Enforcement/Compliance Specialist

Enclosures

cc: Claire Ballard
Jon Terry

January 1994

DEPARTMENT OF ENVIRONMENTAL QUALITY
WASTE DIVISION

SURVEY SHEET
FOR INSPECTION OF HAZARDOUS WASTE FACILITIES

NAME of FACILITY: Lab Corp. (Formerly National Health Lab.)

ADDRESS: 13900 Park Center Rd.
Herndon, VA 22071

EPA ID NUMBER: VAD982699074

FACILITY
REPRESENTATIVE: Rebecca Gearhart

TITLE: Regional Safety Officer

TELEPHONE NUMBER: 703-904-3424

INSPECTOR'S NAME: Stephanie M. Canfield

TITLE: Enforcement/Compliance Specialist

DATE of INSPECTION: April 16, 1999

1. What is the business activity of the firm? (i.e., furniture mfg., metal plating, recycling, etc.)

Medical Laboratory

2. Give a brief description of the waste stream(s) [by chemical name, if possible] and hazardous waste code(s) generated by the firm.

D001/F003 - waste flammable liquid (xylene, alcohol)
various characteristic and listed wastes (result of housekeeping and inventory reduction efforts)

3. List the highest amounts of hazardous waste ever generated in any month of the calendar year and the greatest amount ever accumulated at the site of each type of waste generated.

Waste Code	Amount Generated	Amount Accumulated
D001/F003	200 pounds	400 pounds

4. Does the facility ever generate greater than:
1 kg. of acutely toxic waste (P listed waste or F020-F023 and F026-F027)?

YES

The facility generated P022 waste (9/10/97) during the closure of the toxicology laboratory. The facility has not generated any P-listed waste since September 10, 1997, and does not expect to generate any P-listed waste in the future.

100 kg of clean-up from a spill of P listed waste or F020-F023 and F026-F027 waste?

NO

If yes, then the facility is a large quantity generator.

5. How is the waste presently being handled? Where is it sent?
(List all transporters and facilities, or on-site treatment performed).

Transporter: Safety Kleen (TG), Inc. SCD987574647

TSD: Safety Kleen (TS), Inc. MDD980554653

6. Does the facility generate any hazardous waste that is excluded from regulation?

NO

If yes, list the waste and the basis for exclusion.

7. Does the facility:

Generate

Market

Burn

used oil that is burned for energy recovery? **Underline or circle all that are applicable.** (If the facility **markets** or burns used oil, fill out the **Used Oil Checklist**.)

NO

Does the generator of used oil to be burned for energy recovery (other than a **Conditionally Exempt Small Quantity Generator**) mix the used oil with hazardous waste?

NO

If **YES**, then fill out the **Used Oil Checklist**.

8. Does the facility generate any hazardous waste that is reclaimed to recover economically feasible amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these?

NO

If **Yes**, list the waste, where it is sent, and complete the **Metals Recovery Checklist**.

9. Does the facility generate, transport, store, collect or reclaim spent lead-acid batteries?

NO

If **yes**, Underline or **circle** all that are applicable. If the facility stores batteries before reclaiming them, complete the **Metals Recovery Checklist**.

10. Based on the above, the facility is a:

- a. conditionally exempt small quantity generator
- b. **small quantity generator**
- c. generator
- d. permitted or interim status TSD
- e. unpermitted TSD (explain in comments section)
- f. transporter
- g. other: please explain _____

[Underline or **Circle** All That Are Applicable]

11. Check accumulation times and quantities for the three types of generators. If the times or quantities are exceeded, then the facility is moved up to the next category. Complete the appropriate checklist(s).

A conditionally exempt small quantity generator can accumulate for an indefinite period of time until he has accumulated 1000 kg (approx. 5-55-gallon drums) of non-acute hazardous waste, at which time the accumulation time (180 days or 270 days) for small quantity generators begin.

Small quantity generators can accumulate hazardous waste for up to 180 days or 270 days if the disposal site is over 200 miles away (in containers and tanks only). However, if at any time over 6000 kgs of waste is accumulated, then the small quantity generator becomes a generator, or an unauthorized facility, as applicable.

12. List each container and tank accumulation area. Specify the number and capacity of each tank and container. [Note: Include any satellite accumulation areas. Verify that only 55 gallons of any particular hazardous waste code (or one quart of acutely toxic waste) is at that area.]

Location	# of Containers	# of Tanks	Capacity
Histology/Cytology Lab* (xylene, alcohol)	1	none	2.5 gallons
Special Chemistry Lab* (methanol/acetonitrile) (ethyl acetate/acetic acid)	2	none	2.5 gallons each
Microbiology* (xylene, alcohol)	1	none	2.5 gallons
Chemical Storage+ (xylene, alcohol)	2	none	55 gallons each

*satellite accumulation

+storage area

13. Comments:

See Checklist.

14. Waste Management Flow Diagram:

(On this page sketch a brief, but detailed, flow diagram that includes how and where the waste is generated, the steps through a treatment system (if any), the steps through storage including satellite accumulation areas. Do this for each waste stream including excluded hazardous waste. Include any wastewater treatment facilities at the company, and verify the type of units included in the system, and any hazardous waste streams going to WWT.)

N/A

January 1994

DEPARTMENT OF ENVIRONMENTAL QUALITY
WASTE DIVISION

CHECKLIST FOR HAZARDOUS WASTE INSPECTION OF
SMALL QUANTITY GENERATORS (SQG)

FACILITY NAME: Lab Corp.

EPA ID NUMBER: VAD982699274

INSPECTION DATE: April 16, 1999

NOTE: * means Non-Compliance.

VIRGINIA HAZARDOUS WASTE MANAGEMENT REGULATIONS

PART/SECTION	REGULATION	YES	NO	N/A
6.4.E.4.a.	1. Does the generator ever accumulate a quantity of hazardous waste greater than 6,000 kilograms? (If YES , then use LOG or UNAUTHORIZED FACILITY Checklist.)		X	
6.4.E.4. 6.4.E.5. 6.4.E.6. 6.4.E.4.c. 9.9.L.	2. Does the small quantity generator accumulate hazardous waste for greater than 180 days (or 270 days if the disposal facility is greater than 200 miles away)? (If YES , then use UNAUTHORIZED FACILITY Checklist.) (If the SQG accumulates in TANKS, complete the SQG Tank Section, Items 23 through 25.)		X	
6.4.E.4.d. 9.2.B.1.	3. Does the generator have an internal communication or alarm system capable of providing immediate emergency instruction to facility personnel?	X		
6.4.E.4.d. 9.2.B.2.	4. Does the generator have a device such as a telephone or two-way radio, capable of summoning emergency assistance from local police departments, fire departments, or Commonwealth or local emergency response teams? *** DESCRIBE ON THE LAST PAGE UNDER "COMMENTS".	X		
6.4.E.4.d. 9.2.B.3.	5. Does the facility have portable fire extinguishers, fire control equipment, and decontamination equipment?	X		
6.4.E.4.d. 9.2.B.4.	6. Is there water at adequate volume and pressure to supply expected fire demands?	X		
6.4.E.4.d. 9.2.C.	7. Does the facility test and maintain the equipment in the previous four questions as necessary to assure proper operation?	X		
6.4.E.4.d. 9.2.C.	8. Is a log maintained of these inspections?	X		

PART/SECTION	REGULATION	YES	NO	N/A
6.4.E.4.d. 9.2.E.	9. Is there adequate aisle space to allow the unobstructed movement of personnel, fire protection, spill control, and decontamination equipment to any area of the facility?	X		
6.4.E.4.d. 9.2.F.	10. Has the facility attempted to arrange agreements with the local authorities such that:			
6.4.E.4.d. 9.2.F.1.a.	A. The police, fire and emergency response teams are familiar with the layout of the site, the properties of the hazardous waste handled at the site, normal working areas, entrances to roads inside the facility and possible evacuation routes?		*	
6.4.E.4.d. 9.2.F.1.b.	B. Where more than one police and fire department might respond to an emergency, the agreements specify a primary emergency authority?		*	
6.4.E.4.d. 9.2.F.1.c.	C. Agreements with Commonwealth emergency response teams, emergency response contractors and equipment suppliers are specified? and	X		
6.4.E.4.d. 9.2.F.1.d.	D. The local hospital is familiar with the properties of the hazardous wastes handled and the types of injuries or illnesses which could result from fires, explosions, or releases?		*	
6.4.E.4.e.(1)	11. Is there at least one employee either on the premises or on call at all times with the responsibility for coordinating all emergency response measures? (Emergency coordinator) NAME: <u>Rebecca Gearhart</u> TITLE: <u>Regional Safety Officer</u>	X		
6.4.E.4.e.(2)	12. Is the following posted next to the facility telephone:			
6.4.E.4.e.(2)(a)	A. The name and telephone number of the emergency coordinator?	X		
6.4.E.4.e.(2)(b)	B. The location of fire extinguishers and spill control material; and if present, the location of the fire alarm? and	X		
6.4.E.4.e.(2)(c)	C. The telephone number of the fire department (if no direct fire alarm)?	X		
5.B. 5.C.	13. Does the small quantity generator use a manifest to ship wastes off-site? If NO , go to Item # 18. If YES , continue.	X		
6.2.C.	14. Has the generator determined that the facility has an EPA ID number? (NOTE: Shipments to POTWs must be manifested, if transported by a vehicle and the POTW must meet all permit-by-rule requirements of VHWMR Section 11.8.B.)	X		
5.5.A.7.	15. Has the generator determined that the transporter has a valid EPA Identification number and a valid Virginia Transporter Permit?	X		
6.3. 5.3.B.1.	16. Is the following information on the manifest:			
5.3.B.1.	A. The generator's name, mailing address, EPA ID number, and telephone number?	X		
5.3.B.2.	B. A unique five digit number assigned to this manifest by the generator?	X		

PART/SECTION	REGULATION	YES	NO	N/A
5.3.B.3.	C. The total number of pages of the manifest?	X		
5.3.B.4.	D. The company name and EPA ID number of each transporter used?	X		
5.3.B.5.	E. The company name, site address, and EPA ID number of the facility designated to receive the waste?	X		
5.3.B.6.	F. The U.S. DOT description of each waste to include its proper shipping name, hazard class, and ID number(UN/NA) as identified in the Virginia Regulations Governing the Transportation of Hazardous Material?	X		
5.3.B.7.	G. The quantities of waste being shipped? and	X		
5.3.C.	<p>H. The following certification:</p> <p>"I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by (mode of transportation) according to applicable international and national governmental regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to a degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford."</p>	X		
6.5.C.2.	<p>17. Exception reporting:</p> <p>If the generator (SQG) has not received a copy of a manifest signed by facility within 60 days of initial transporter, did he submit a legible copy of manifest with an indication of not receiving a confirmation of delivery, to the Director?</p>			X
5.C.	18. Does the small quantity generator have his wastes reclaimed under a contract, and use only a shipping paper? If YES,		X	
5.C.1.a.	A. Are the type of waste and frequency of reclamation shipments specified in the agreement?			X
5.C.1.b.	B. Is the vehicle used to transport the waste to the recycling facility and to deliver material back to the generator owned and operated by the reclaimer? and			X
5.C.2.	C. Does the small quantity generator maintain a copy of the agreement in his files for at least three years after termination or expiration of the agreement?			X
6.5.A.1.3. 15.1.G.1.a.	19. Does the generator retain copies of all manifests, test results and waste analyses for at least three years? Land Disposal Restriction Form should be retained for at least three years.	X		
6.4.E.4.e.(3)	20. Does the generator ensure all employees are thoroughly familiar with proper waste handling and emergency procedures?	X		

PART/SECTION	REGULATION	YES	NO	N/A
6.5.D.	21. Has the generator ever submitted a release report if responsible for release of Hazardous Substance which threatens public health? . (Must notify NRC, Local Government, the Department.)			X
6.4.E.4.b. 9.8.	22. Use and Management of Containers for 180 day accumulation areas: (270 days if TSF is over 200 miles away.)			
9.8.B.	A. Are all containers holding hazardous waste in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation?	X		
9.8.C.	B. Are the containers lined or made of materials compatible with hazardous waste placed into them so that the container will not react with, or otherwise be incompatible with, the hazardous wastes stored?	X		
6.4.E.4.d. 6.4.E.1.b.	C. Is the date upon which each period of accumulation begins clearly marked and visible for inspection on each container?	X		
6.4.E.4.d. 6.4.E.1.c.	D. Is the container labeled or marked clearly with the words "Hazardous Waste"?	X		
9.8.D.1.	E. Are all containers holding hazardous waste kept closed during storage except as necessary to add or remove waste?	X		
9.8.E.	F. Are areas where hazardous waste containers are stored inspected by the owner/operator at least weekly?	X		
9.8.G.1.	G. Are incompatible wastes placed in separate containers? and	X		
9.8.G.3.	H. Are storage containers holding hazardous wastes which are incompatible with any materials or other hazardous wastes stored nearby separated from the other materials or protected from them by means of dikes, berms, walls, or other devices?	X		
6.4.E.3.a.	I. Does the generator have satellite accumulation areas where up to 55 gal of any one type of Hazardous Waste (HW) (1 qt acutely HW) are accumulated? If yes,	X		
6.4.E.3.a.	1. Is the area located at or near the point of hazardous waste generation where the wastes initially accumulate?	X		
6.4.E.3.a.(1) 9.8.B.	2. Are the containers in good condition?	X		
6.4.E.3.a.(1) 9.8.C.	3. Are the containers compatible with the waste?	X		
6.4.E.3.a.(1) 9.8.D.1.	4. Are the containers kept closed except as necessary to add or remove waste? and	X		
6.4.E.3.a.(2)	5. Are the containers marked with the words "Hazardous Waste" or other words that identify the contents of the container?	X		
6.4.E.3.b.	J. Are amounts in excess of those allowed being accumulated in the satellite accumulation area? If yes,		X	
	1. Has the generator marked the excess amount with the date the excess amount began accumulating? and			X

PART/SECTION	REGULATION	YES	NO	N/A
	2. Has the generator either removed the excess amount within three days of the date of excess accumulation or has he complied with all other provisions for accumulation areas. Namely, has he notified the Executive Director about the location of the accumulation area?			X
9.9.L.	23. Does the small quantity generator accumulate in tanks? If YES, describe Tank System in the COMMENT Section.		X	
9.9.L.2.c.	A. If the TANK is uncovered, is there at least 2 feet of freeboard or a system with the capacity to hold the volume equivalent to 2 feet of freeboard? Describe the System in the COMMENT Section.			X
9.9.L.2.d.	B. If the TANK is fed continuously, is there a waste feed cutoff system or by-pass system? Describe the System in the COMMENT Section.			X
9.9.L.3.	C. Does the Small Quantity Generator (SQG) inspect the following at least once each operating day:			
9.9.L.3.a.	1. Discharge control equipment?			X
9.9.L.3.b.	2. Data gathered from monitoring equipment?			X
9.9.L.3.c.	3. The level of waste in the Tanks?			X
9.9.L.3.d.	D. Does the SQG inspect the following at least weekly:			
9.9.L.3.d	1. The construction materials of the Tanks for corrosion or leaking?			X
9.9.L.3.e.	2. The area immediately surrounding the discharge confinement system for leaks?			X
9.9.L.5.	E. If ignitable or reactive waste are generated, is the waste:			X
9.9.L.5.a.(1)	1-treated, rendered, or mixed before or immediately after placement so that the waste is no longer ignitable or reactive; or			X
9.9.L.5.a.(2)	2-protected from any material or conditions that may cause the waste to ignite or react; or			X
9.9.L.5.a.(3)	3-is the Tank used only for emergencies?			X
9.9.L.5.b.	F. If the Tank is covered and manages ignitable or reactive waste, are the buffer zones for the National Fire Protection Association codes met? List the required and actual distances: Required Actual _____ _____			X
9.9.L.6	G. Are incompatible waste placed in the same tank? If YES,			X
	Is the tank cleaned prior to placing the incompatible waste in the Tank?			X
6.4.E.4.d	24. Is the Tank clearly marked with the words "Hazardous Waste"?			X

PART/SECTION	REGULATION	YES	NO	N/A
	25. DELETED			
15.1.A.2.	26. Does the facility generate, transport, treat, store or dispose any land-restricted wastes? (See VHWMR Part 15) *** PLEASE LIST ON THE LAST PAGE UNDER "COMMENTS".	X		
15.1.G.1.a.	27. For restricted wastes which the generator is managing for which he has not met the applicable treatment standards, has the generator accompanied each shipment of waste with a notification to the treatment facility of the appropriate treatment standards and any applicable prohibitions?	X		
	28. Did the notification include the following information:			
15.1.G.1.a. (1)	A. EPA Hazardous Waste Number?	X		
15.1.G.1.a. (2)	B. The corresponding treatment standards and all applicable prohibitions set forth in VHWMR Section 15.3.c.?	X		
15.1.G.1.a. (3)	C. The manifest number associated with the shipment of waste? and	X		
15.1.G.1.a. (4)	D. Waste analysis data, where available?	X		
15.1.A.3.	29. Is land disposal of wastes occurring? If Yes,		X	
15.1.A.3.a.	A. Has the facility been granted an extension to the effective date for land restrictions applicable to its restricted waste? OR			X
15.1.A.3.b.	B. Has the facility been granted an exemption from prohibition pursuant to a petition for those land-restricted wastes and units covered by the petition? OR			X
15.1.A.3.c.	C. Are the wastes hazardous only because they exhibit a hazardous characteristic and are they disposed outside the Commonwealth into an injection well without exhibiting any prohibited characteristic of hazardous waste at the point of injection?			X
15.1.A.5.a.	30. Is the waste generated by small quantity generators of less than 220 pounds (100 kg) of hazardous waste, or 1 kg of acutely hazardous waste per month? If so, the wastes are not subject to any provision of Part XV.		X	
15.1.E.	31. Has the owner/operator submitted an application for case-by-case extension to the effective date of any applicable restriction?		X	
6.4.E.7., 6.4.E.4.d., 15.1.G.1.d.	32. Is the SQG treating waste in Tanks or Containers in order to meet applicable treatment standards under VHWMR § 15.4?	*		
15.1.G.1.d.	33. If Yes, has the SQG developed a Waste Analysis Plan?		*	
15.1.G.1.d. (2)	34. Has the Waste Analysis Plan been filed with the Director a minimum of 30 days prior to the treatment activity?		*	
15.1.F.	35. Has the owner/operator been granted a petition seeking an exemption from a prohibition for the disposal of hazardous waste in a particular unit or units?		X	

PART/SECTION	REGULATION	YES	NO	N/A
15.1.C.1.	36. Are facility representatives diluting the restricted waste or residual from treatment of the restricted waste as a substitute for adequate treatment, to circumvent the effective date of prohibition, to otherwise avoid a prohibition, or to circumvent a land disposal prohibition?		X	
15.1.D.1.	37. Is the facility treating land-restricted wastes in a surface impoundment or series of surface impoundments? (Note: Evaporation of hazardous constituents in a surface impoundment as the principal means of treatment is not considered to be an acceptable form of treatment for land restricted wastes.)		X	
	38. If Yes, does the facility meet the following requirements:			
15.1.D.1.b. 15.1.G. 15.3.C. 15.4. 15.3.	A. Are the residues of the treatment analyzed as specified in VHWMR § 15.1.G. or § 15.3.C. to determine if they meet the applicable treatment standards or VHWMR § 15.4, or where no applicable treatment standard exists, the applicable prohibition levels specified in VHWMR § 15.3?			X
15.1.D.1.c. 9.10.B.1. 10.10.B.3.	B. Has the owner/operator installed two or more liners and a leachate collection system consisting of an upper and lower liner designed, constructed and operated to prevent the migration of any constituents through the liners?			X
15.1.D.1.c. 10.5.	C. Is the facility in compliance with the applicable groundwater monitoring requirements of VHWMR § 10.5?			X
15.1.D.1.d.	D. Has the owner/operator submitted a written certification to the Executive Director that the requirements of § 15.1.D.1.C. have been met which states: "I certify under penalty of law that the requirements of 15.1.D.1.c. have been met for all surface impoundments being used to treat restricted waste. I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment." and			X
15.1.D.1.d.	E. Has the owner/operator submitted a copy of the waste analysis plan for his restricted wastes accompanied by the above certification?			X
15.1.G.1.b.	39. For restricted wastes which the generator has determined can be land disposed without further treatment , has the generator accompanied each shipment of waste with a notification and certification to the land disposal facility that the waste meets the applicable treatment standards and the applicable prohibitions of VHWMR § 15.3.C.?			X
	40. Did the notification include the following information:			
15.1.G.1.b. (1)(a)	A. EPA Hazardous Waste Number?			X
15.1.G.1.b. (1)(b)	B. The corresponding treatment standards and all applicable prohibitions?			X
15.1.G.1.b. (1)(c)	C. The manifest number associated with the shipment of waste? and			X

PART/SECTION	REGULATION	YES	NO	N/A
15.1.G.1.b. (1)(d)	D. Waste analysis date, where available?			X
15.1.G.1.b.2.	41. Was the certification signed by an authorized representative, and did it state the following: "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in VHWMR § 15.4. and all applicable prohibitions set forth in VHWMR § 15.3.C. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."			X
15.1.G.1.c.	42. Have restricted wastes which have received a case-by-case exemption, been granted an exemption through petition, or those wastes subject to a national variance, has the generator forwarded a notice with the waste to the land disposal facility stating that the waste is exempt from the land disposal restrictions?			X
15.1.G.1.g.	43. Does the generator retain on-site copies of all notices, certifications, demonstrations, waste analysis date, and other documentation for at least five years from the date the waste was last sent to on-site or off-site treatment, storage or disposal?	X		
15.5.	44. Is the generator storing land restricted waste? (For one year storage only)		X	
15.5.1.a.	45. If Yes, is the storage on-site solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment or disposal?			X

COMMENTS:

4. Lab Corp. uses the telephone (911) to summon emergency assistance.

10. A., B., & D. At the time of the inspection, the facility had not attempted to arrange agreements with the local authorities.

26. D001/F003

32.- 34. At the time of the inspection, Lab Corp. was collecting ethyl acetate/acetic acid waste in a satellite accumulation area. Lab Corp. periodically takes the collected waste, neutralizes it and pours it down the drain leading to the Publically Owned Treatment Works (POTW). Lab Corp. has not developed or submitted a Waste Analysis Plan for this treatment activity.



Notification of Hazardous Waste Activity

United States Environmental Protection Agency
Washington, DC 20460

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

For Official Use Only

Comments

C
C

Installation's EPA ID Number

Approved

Date Received
(yr. mo. day)C
F

VAD982699274

T/A C
1

AUG 29 1989

I. Name of Installation

NATIONAL HEALTH LABORATORIES

II. Installation Mailing Address

Street or P.O. Box

C
3

13900 PARK CENTER ROAD

City or Town

State

ZIP Code

C
4

HERNDON

VA 22071

III. Location of Installation

Street or Route Number

C
5

SAME

City or Town

State

ZIP Code

C
6

IV. Installation Contact

Name and Title (last, first, and job title)

Phone Number (area code and number)

C
2

BARNARD, JOHN QCTECH 703 742 3100

V. Ownership

A. Name of Installation's Legal Owner

B. Type of Ownership (enter code)

C
R

NAT'L HEALTH LABS, INC PL

VI. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity

B. Used Oil Fuel Activities

- ☒ 1a. Generator ☒ 1b. Less than 1,000 kg./mo.
☐ 2. Transporter
☐ 3. Treater/Storer/Disposer
☐ 4. Underground Injection
☐ 5. Market or Burn Hazardous Waste Fuel
(enter 'X' and mark appropriate boxes below)
☐ a. Generator Marketing to Burner
☐ b. Other Marketer
☐ c. Burner

- ☐ 6. Off-Specification Used Oil Fuel
(enter 'X' and mark appropriate boxes below)
☐ a. Generator Marketing to Burner
☐ b. Other Marketer
☐ c. Burner

- ☐ 7. Specification Used Oil Fuel Marketer (or On site Burner)
Who First Claims the Oil Meets the Specification

VII. Waste Fuel Burning: Type of Combustion Device (enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)

☐ A. Utility Boiler☐ B. Industrial Boiler☐ C. Industrial Furnace

VIII. Mode of Transportation (transporters only — enter 'X' in the appropriate box(es))

☐ A. Air ☐ B. Rail ☐ C. Highway ☐ D. Water ☐ E. Other (specify)

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

☐ A. First Notification☒ B. Subsequent Notification (complete item C)

C. Installation's EPA ID Number

VAD020314506

C		Only		T/A		C	
W						1	

98-269-9274

X. Description of Hazardous Wastes (continued from front)

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1 0009	2 F003	3 F005	4	5	6
7	8	9	10	11	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
----	----	----	----	----	----

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

☒ 1. Ignitable
(D001)

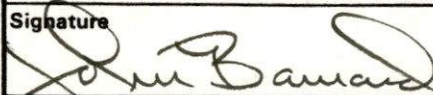
☒ 2. Corrosive
(D002)

☐ 3. Reactive
(D003)

☒ 4. Toxic
(D000)

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature 	Name and Official Title (type or print) JOHN BARNARD, QC TECH	Date Signed AUGUST 1989
---	--	----------------------------